

**INSPECTION OF LABORATORIES PERFORMING MOHS SURGERY AND  
MICROSURGERY FOR CUTANEOUS CARCINOMAS**

**1. PURPOSE:** Change 1 to Veterans Health Administration (VHA) Directive 99-063 includes reference to the correct Title 42, Code of Federal Regulations (CFR) 1499, in subparagraphs 2.a. and 4.a. **NOTE:** *MOHS surgery is named for Frederic E. Mohs who, as a medical student, developed this microscopically controlled removal of skin tumors.*

**2. POLICY:** As required by Public Law 102-139, VHA laboratory testing will meet the regulations (42 CFR, Part 493) implementing the Clinical Laboratory Improvement Amendments of 1988 (CLIA). All laboratory testing comes under the oversight of the clinical laboratory. CLIA covers the processing and review of frozen sections. In most medical facilities, this activity occurs in the main clinical pathology laboratory.

**3. ACTION:** Change subparagraphs 2.a. and 4.a. to read as follows:

2.a. There are, however, situations in which this activity might occur outside of those laboratories. Many MOHS surgery units fall into this latter category. There may be facilities in which other cutaneous surgery is performed, utilizing frozen section controls that are performed outside of the clinical laboratory and/or are reviewed by non-pathologists. Under all of these circumstances, the individuals performing the histopathology must meet the requirements in 42 CFR 493.1499.

4.a. 4 CFR Section 493.1499.

**5. FOLLOW-UP RESPONSIBILITY:** The Chief Consultant, Diagnostic Services Strategic Health Group (SHG), (115), is responsible for the contents of this Directive.

**6. RESCISSIONS:** This VHA Directive and Change 1 expire December 31, 2004.

Francis Murphy, M.D. for  
Thomas L. Garthwaite, M.D.  
Deputy Under Secretary for Health

Distribution: CO: E-mailed 2/25/2000  
FLD: VISN, MA, DO, OC, OCRO, and 200 - Faxed 2/25/2000  
EX: Boxes 104, 88, 63, 60, 54, 52, 47, and 44 - Faxed 2/25/2000

**THIS VHA DIRECTIVE EXPIRES DECEMBER 31, 2004**